

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
KELLY JUNE BROGAN,

Plaintiff,

-v-

TARGET CORPORATION and JOHN DOE, first and  
last name being fictitious and unknown,

Defendants.

CIVIL ACTION NO.: 22 Civ. 6414 (PGG) (SLC)

**INITIAL CASE MANAGEMENT PLAN**

**SARAH L. CAVE**, United States Magistrate Judge.

This action has been referred, pursuant to 28 U.S.C. § 636(b)(1)(A), to Magistrate Judge Sarah L. Cave for general pretrial management, including scheduling discovery, non-dispositive pretrial motions, and settlement. All pretrial motions and applications, including those relating to scheduling and discovery (but excluding motions to dismiss or for judgment on the pleadings, for injunctive relief, for summary judgment, or for class certification under Fed. R. Civ. P. 23) must be made to Magistrate Judge Cave and must comply with her Individual Practices, available on the Court's website at <https://www.nysd.uscourts.gov/hon-sarah-l-cave>.

Having reviewed the parties' proposed case management plan (ECF No. 10-1 (the "PCMP")), the Court forgoes scheduling an initial case management conference, and orders as follows:

1. The parties' PCMP is ADOPTED, and the Court orders as follows:

- a. No additional parties may be joined except with leave of the Court. Except for good cause shown, any motion to join additional parties must be filed by

**December 5, 2022.**

- b. The last date to amend any pleading pursuant to Fed. R. Civ. P. 15(a) is **December 5, 2022**. Amendment of pleadings after this date will only be permitted upon a showing of “good cause” under Fed. R. Civ. P. 16(b)(4).
- c. Fact discovery shall be completed by **February 3, 2023**, and shall proceed as follows:
  - i. Initial requests for the production of documents shall be served by **November 10, 2022**.
  - ii. Initial sets of interrogatories shall be served by **November 10, 2022**.
  - iii. Requests to admit shall be served by **January 10, 2023**.
  - iv. Depositions shall be completed by **February 3, 2023**.
- d. By **February 10, 2023**, the parties shall file a joint letter certifying the completion of fact discovery.
- e. Expert discovery shall be completed by **March 3, 2023**, and shall proceed as follows:
  - i. Party-proponent disclosures shall be served by **February 3, 2023**.
  - ii. Party-opponent disclosures shall be served by **February 17, 2023**.
  - iii. Expert depositions shall be completed by **March 3, 2023**.
- f. By **March 10, 2023**, the parties shall file a joint letter certifying the completion of expert discovery.
- a. Parties seeking to make post-discovery dispositive motions shall file shall submit a letter addressed to the Honorable Paul G. Gardephe in accordance

with Rule 4(A) of the Judge Gardephe's Individual Practices by **March 10, 2023**.

Opposition letters are due by **March 15, 2023**.

2. A status conference is scheduled for **Wednesday, January 11, 2023 at 11:00 am** on the Court's conference line. The parties are directed to call: (866) 390-1828; access code: 3870-9799, at the scheduled time. By **January 4, 2023**, the parties shall a joint letter reporting on the status of discovery.

Dated: New York, New York  
November 3, 2022

SO ORDERED.

  
SARAH L. CAVE  
United States Magistrate Judge